



Rowsey
Financial
Forensics LLC

September 12, 2024

Mr. Eugene M. LaFlamme
McCoy Leavitt Laskey LLC
N19 W24200 Riverwood Drive
Suite 125
Waukesha, WI 53188

P.O. Box 6326
Helena, MT 59604
Phone: 406.422.0171

RE: Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Dear Mr. LaFlamme:

Pursuant to Rule 26 (a) (2) of the Federal Rules of Civil Procedure, I submit the following report. This report contains my preliminary opinions relating to the present value of the estimated future medical and other expenses of Stephanie Wadsworth. My opinions were formed based upon my investigation, research, information obtained, and documents reviewed as of this date. I reserve the right to modify the opinions and conclusions expressed in this report based upon further investigation conducted after the date of this report. I may prepare additional exhibits to be used as a summary of or in support of my opinions.

I. SUMMARY OF OPINIONS

My opinions are summarized as follows:

1. The present value of future medical and other expenses included in the report of Ms. Cloie B. Johnson is approximately \$158,000, as computed at Schedules 5A and 8A, and summarized at Schedule 10.
2. The present value of future potential laser treatments included in Ms. Cloie B. Johnson's report ranges from approximately \$1,350 to \$150,000, depending on the frequency and duration of the treatments, as computed at Schedules 11A through 11D, and summarized at the bottom of Schedule 10.
3. The present value of future medical and other expenses included in the Life Care Plan prepared by Plaintiff's expert, Ronald E. Snyder, MD, is approximately \$2,260,000, as computed at Schedules 5 through 9, and summarized at Schedule 10.

II. BASES AND REASONS FOR OPINIONS

Overview

Ms. Wadsworth sustained injuries from a house fire that occurred on February 1, 2022. Ms. Wadsworth is claiming future medical and other expenses related to the incident. My task in this engagement was to compute the present value of the future medical and other costs

EXHIBIT P

included in the report of Ms. Cloie Johnson and in the Life Care Plan (LCP) prepared by Plaintiff's expert, Ronald E. Snyder, MD.

See Schedule 1 where I have summarized the basic facts and assumptions relating to dates and life expectancy information.

Present Value of Future Medical and Other Costs

I obtained the report of Ms. Chloie Johnson and the LCP prepared by Plaintiff's expert, Dr. Snyder. In her report, Ms. Johnson, addresses the costs and services included in Dr. Snyder's LCP, which identifies estimated costs and frequencies for the various medical treatments and procedures and other items and services that Ms. Wadsworth will require throughout her life expectancy. Two sets of computations were presented, incorporating the costs and services included in the two reports.

In order to prepare the present value calculations of the future costs, I applied the appropriate medical discount rate for each medical and other cost (developing separate schedules for the determined costs) through Ms. Wadsworth's life expectancy, discussed in a later section of this report. See Schedule 4 that summarizes treatments and costs included in Ms. Johnson and Dr. Snyder's reports. Schedules 5-9 compute the present value of costs for each category (by inflation index) of treatment in the reports. Schedule 10 summarizes the present values of the costs included in the reports.

The losses in the inflationary items category of Dr. Snyder's report were reduced by the present value of the additions to the home (\$32,957) in the last year, as those costs add value to the home that will be realized in the future. The 2025 losses in the inflation items category were also reduced by the first quarter 2024 average price of new and used cars in the U.S. (\$37,053).¹ The losses were also reduced annually starting in 2030 by the average net amount spent by Americans on cars in 2022 (which was increased by inflation for three years to reach the 2025 value).²

I would like to point out that Dr. Snyder includes \$41,250 of annual household services and maintenance for Ms. Wadsworth. This amount appears excessive. The publication, Dollar Value of a Day – 2020, includes the value of day for unemployed females, living with spouses and minor children in the home, to be \$64.20 per day, or \$23,433 per year. The reported value includes inside housework, food cooking and clean up, pets, homes and vehicles, household management, shopping, obtaining services and travel for household activity. After adjusting for inflation, the 2020 value would be close to \$25,000 per year for all services. This is significantly less than the amounts included in Dr. Snyder's LCP.

The mean annual wage for maids and housekeeping cleaners in Wyoming was \$32,720 in 2023, according to the Bureau of Labor Statistics. Using Dr. Snyder's figures, Ms.

¹ *Car sale statistics 2024*, Consumer Affairs, July 26, 2024.

² *Consumer Expenditures - - 2022*, Bureau of Labor Statistics, September 8, 2023.

Wadsworth could hire a full-time housekeeper, plus the heavy housekeeping and maintenance services included in the LCP. Dr. Snyder includes a daily value of \$113 for household services for every day of the year. As previously stated, the value for this category included in Dr. Snyder's report appears significantly overstated. This category is also addressed by Ms. Johnson in her report, which includes a more reasonable value for the services.

Life Expectancy

I utilized the life expectancy included in Dr. Snyder's report. At page 55 of his report, Dr. Snyder indicates Ms. Wadsworth has a life expectancy of 44 years from age 37. Accordingly, I used a life expectancy to age 81 in the loss computations (see Schedule 1).

Interest and Discount Rates – Medical Costs

The net discount rates for computing the present value of Ms. Wadsworth's future medical expenses are based on the historical relationship between the elements of medical inflation and CPI inflation. For example, if medical inflation was 150% of CPI inflation during the period 2003-2022, and CPI was 2.0%, I would use a 3.0% medical inflation rate for all future periods. At Schedule 3, I compared the relationship between medical inflation rates and CPI inflation for the 2003-2022 period. The rates are as follows:

	2003-2022
	Percent of
<u>Type of Inflation</u>	<u>CPI</u>
CPI inflation	100%
Prescription drugs	108%
Medical care commodities	85%
Professional medical services	99%
Hospital services	214%

I then multiplied the expected inflation rate of 2.5% by each of the above factors, generating the inflation rates used for each medical cost category. These inflation rates were then subtracted from 4.66%³ to determine the net discount rate for each medical cost component. The net discount rates are as follows:

³ This is the current average interest rate, using yields currently available on U.S. Government obligations, as shown on Schedule 2, through life expectancy.

<u>Medical Requirement</u>	<u>Net Discount Rate</u>
CPI inflation	2.16%
Prescription drugs	1.97%
Medical care commodities	2.54%
Professional medical services	2.19%
Hospital services	-0.68%

Present Value of Potential Future Laser Treatments

At page 69 of her report, Ms. Johnson indicates that the LCP “does not include future laser treatments which would cost in the range of \$1,200.00 to \$1,500.00.” Accordingly, I computed the present value of potential future laser treatments under four scenarios (as the frequency and duration of the treatments were not included in the LCP). At Schedules 11A, 11B, 11C and 11D, I computed the present value of one, two, three and four laser treatments per year, respectively. I used an average cost of \$1,350 per treatment.

Each schedule, 11A through 11D, includes a cumulative column that can be used to determine the present value of the future treatments once the duration of the treatments is determined, if it is determined to be more than one year or less than life expectancy. The low-end cost assumes only one treatment would be needed in 2025 (computed at Schedule 11A) and the high-end cost assumes four treatments would be needed per year through Ms. Wadsworth’s life expectancy.

The same discounting methodology used for computing the present value of the other medical costs included in the reports (discussed previously) was used to compute the present value of the potential future laser treatment costs. The low and high-end present values of the laser treatment costs are summarized at Schedule 10.

The present value of the costs included in the two reports are summarized at Schedule 10.

III. INFORMATION CONSIDERED

In determining Ms. Wadsworth’s economic losses, I considered the following documents and information:

1. Yields on U.S. Treasury Notes and Bonds per the Wall Street Journal, April 10, 2024.
2. Consumer Price Index (CPI) and wage growth information per “The Economic Report of the President” and various publications of the U.S. Department of Labor.
3. Medical inflation rates, 2003 through 2022, U.S. Department of Labor, Bureau of Labor Statistics

4. Summons in a Civil Action.
5. Life Care Plan prepared by Ronald E. Snyder, MD dated June 4, 2024.
6. Report of Ms. Cloie B. Johnson, M.Ed., ABVE, CCM dated September 5, 2024.
7. *May 2023 State Occupational Employment and Wage Estimates, Wyoming, Maids and Housekeeping Cleaners*, U.S. Bureau of Labor Statistics, April 3, 2024.
8. The Dollar Value of a Day 2020 Dollar Valuation, Expectancy Data, Economic Demographers.
9. Deposition transcript of Stephanie Wadsworth taken February 27, 2024.
10. Deposition transcript of Matthew Wadsworth taken February 26, 2024.
11. *Consumer Expenditures - - 2022*, Bureau of Labor Statistics, September 8, 2023.
12. *Car sale statistics 2024*, Consumer Affairs, July 26, 2024.

IV. EXHIBITS

The computations of the present value of future medical and other expenses of Ms. Wadsworth are documented in Schedules 1-10. Since the schedules are computer prepared, some rounding differences may be noted. A brief description of the information contained in each of those schedules is as follows:

- | | |
|-------------|---|
| Schedule 1 | This schedule sets forth the basic facts and assumptions, such as time frames and life expectancy information for Ms. Wadsworth. |
| Schedule 2 | This schedule lists the yields on U.S. Treasury Securities for the years 2025 through 2054, which were used for the discount rates in the present value computations. |
| Schedule 3 | This schedule summarizes changes in medical and CPI inflation from 2003 to 2022. |
| Schedules 4 | This schedule summarizes the cost and frequencies of costs and services included in the LCP prepared by Dr. Snyder and the costs included in the report of Ms. Cloie Johnson. |

- Schedules 5-9 These schedules compute the present value cost of the medical costs included in the LCP prepared by Dr. Snyder and the report of Ms. Cloie Johnson through Ms. Wadsworth's life expectancy.
- Schedule 10 This schedule summarizes the results of Schedules 5-9.
- Schedules 11A-11D These schedules compute the present value cost of the potential laser treatments, from one per year to four per year, included in the report of Ms. Cloie Johnson, through a one-year loss period and Ms. Wadsworth's life expectancy.
- Schedule 12 The resume of Charity A. Rowsey.

QUALIFICATIONS AND COMPENSATION

A summary of the professional qualifications and testimony experience of Charity A. Rowsey is provided in the attached resume. Rowsey Financial Forensics LLC charges an hourly rate of \$385 for Ms. Rowsey for all services rendered.

A handwritten signature in blue ink that reads "Charity A. Rowsey". The signature is written in a cursive, flowing style.

Rowsey Financial Forensics LLC

Charity A. Rowsey, CPA, MAFF, CVA

Enclosures (17)

Schedule 1

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC
Basic Facts and Assumptions

Date of birth	16-Mar-87
Date of incident	1-Feb-22
Age at date of incident	34.88
Date of valuation	3-Mar-25
Age at valuation date	37.97
Life expectancy at age 37 (page 55 of Snyder LCP)	44
Age at life expectancy	81.00
Date at life expectancy	15-Mar-68

Schedule 2

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC
Interest Rates

U.S. Treasury Strips per the April 10, 2024
Wall Street Journal

<u>Year</u>	<u>Yield</u>
2025	5.04%
2026	4.85%
2027	4.72%
2028	4.64%
2029	4.62%
2030	4.60%
2031	4.58%
2032	4.57%
2033	4.56%
2034	4.55%
2035	4.55% (A)
2036	4.42%
2037	4.49%
2038	4.55%
2039	4.65%
2040	4.74%
2041	4.78%
2042	4.79%
2043	4.79%
2044	4.79%
2045	4.78%
2046	4.78%
2047	4.77%
2048	4.76%
2049	4.72%
2050	4.69%
2051	4.66%
2052	4.65%
2053	4.63%
2054	<u>4.63% (B)</u>
Average interest rate 2025-2068	<u><u>4.66%</u></u>

(A) The 2035 rate was not available and was assumed to equal the 2034 rate.

(B) Post-2054 rates were not available and were assumed equal to the 2053 rate.

Schedule 3

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC
 Computation of Medical Growth Rates and Comparison
 to CPI Inflation, 2003 to 2022

<u>Year</u>	<u>CPI-U</u>	<u>Prescription Drugs</u>	<u>Medical Care Commodities</u>		<u>Professional Medical Services</u>	<u>Hospital Services</u>	<u>Nursing Home Services</u>
2003	184.0	326.3	262.8		261.2	144.7	135.2
2004	188.9	337.1	269.3		271.5	153.4	140.4
2005	195.3	349.0	276.0		281.7	161.6	145.0
2006	201.6	363.9	285.9		289.3	172.1	151.0
2007	207.3	369.2	290.0		300.8	183.6	159.6
2008	215.3	378.3	296.0		311.0	197.2	165.3
2009	214.5	391.1	305.1	(a)	319.4	210.7	171.6
2010	218.1	407.8	314.7		328.2	227.2	177.0
2011	224.9	425.0	324.1		335.7	241.2	182.2
2012	229.6	440.1	333.6		342.0	253.6	188.8
2013	233.0	442.6	335.1		349.5	265.4	194.5
2014	236.7	458.3	343.4		355.2	278.8	200.1
2015	237.0	479.3	354.6		361.5	290.1	206.4
2016	240.0	502.5	366.8		371.5	303.3	213.7
2017	245.1	519.6	377.0		375.1	318.2	220.3
2018	251.1	528.0	381.4		378.4	332.2	227.8
2019	255.7	526.8	381.3		382.6	338.8	235.3
2020	258.8	532.1	383.2		389.9	353.0	241.7
2021	271.0	522.4	377.1		401.9	363.5	249.6
2022	292.7	533.9	388.1		411.8	376.8	260.1

SOURCES: U.S. Department of Labor, Bureau of Labor and Statistics

<u>Year</u>	<u>CPI-U</u>	<u>Prescription Drugs</u>	<u>Medical Care Commodities</u>		<u>Professional Medical Services</u>	<u>Hospital Services</u>	<u>Nursing Home Services</u>
2003	2.28%	3.10%	2.50%		2.88%	7.42%	5.71%
2004	2.66%	3.31%	2.47%		3.94%	6.01%	3.85%
2005	3.39%	3.53%	2.49%		3.76%	5.35%	3.28%
2006	3.23%	4.27%	3.59%		2.70%	6.50%	4.14%
2007	2.85%	1.44%	1.43%		3.97%	6.65%	5.69%
2008	3.84%	2.47%	2.08%		3.38%	7.43%	3.60%
2009	-0.36%	3.38%	3.06%		2.70%	6.87%	3.80%
2010	1.64%	4.29%	3.15%		2.76%	7.83%	3.13%
2011	3.16%	4.21%	2.98%		2.28%	6.16%	2.93%
2012	2.07%	3.57%	2.94%		1.89%	5.12%	3.63%
2013	1.46%	0.55%	0.45%		2.19%	4.69%	3.00%
2014	1.62%	3.56%	2.48%		1.63%	5.01%	2.88%
2015	0.12%	4.58%	3.26%		1.79%	4.08%	3.16%
2016	1.26%	4.84%	3.43%		2.77%	4.52%	3.52%
2017	2.13%	3.40%	2.80%		0.97%	4.92%	3.08%
2018	2.44%	1.61%	1.16%		0.86%	4.42%	3.43%
2019	1.81%	-0.23%	-0.04%		1.11%	1.98%	3.28%
2020	1.23%	1.01%	0.49%		1.91%	4.17%	2.72%
2021	4.70%	-1.82%	-1.59%		3.10%	3.00%	3.28%
2022	8.00%	2.21%	2.93%		2.45%	3.66%	4.20%
Average 2003 - 2022	2.48%	2.66%	2.10%		2.45%	5.29%	3.62%
As a percent of CPI	100%	108%	85%		99%	214%	146%
Expected CPI	2.50%	2.50%	2.50%		2.50%	2.50%	2.50%
Medical related inflation	2.50%	2.69%	2.12%		2.47%	5.34%	3.65%
Average interest rate (Schedule 2)	4.66%	4.66%	4.66%		4.66%	4.66%	4.66%
Net discount rate	2.16%	1.97%	2.54%		2.19%	-0.68%	1.01%

(a) BLS divided and reset category in 2009.

Schedule 4

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC
Future Medical and Other Costs and Frequencies

Years to life expectancy at valuation date

43.03

Physician Services:	<u>Physician Services</u>	<u>Schedule</u>	<u>Snyder Units</u>	<u>Johnson Units</u>	<u>Period</u>	<u>Snyder Annual Frequency</u>	<u>Johnson Annual Frequency</u>	<u>Snyder Unit Cost</u>	<u>Johnson Unit Cost</u>	<u>Snyder Annual Cost</u>	<u>Johnson Annual Cost</u>
	Burn surgery evaluation, monitoring and treatment	5	6 per year	1 per year	2025-2029	6.00	1.00	\$ 251.12	\$ 242.61	\$ 1,507	\$ 243
	Burn surgery evaluation, monitoring and treatment	5	1 per year	1 per year	2030-2068	1.00	1.00	251.12	242.61	251	243
	Plastic surgery monitoring/treating feet lesions	5	4 per year	1 per year	2025-2068	4.00	1.00	202.12	202.12	808	202
	Hair transplantation monitoring secondary scarring alopecia	5	6 per year	none	2025-2026	6.00	-	202.12	-	1,213	-
	Physiatry	5	1 per year	none	2025-2068	1.00	-	252.12	-	252	-
	ENT	5	1 per year	1 per year	2025-2068	1.00	1.00	220.87	220.87	221	221
	Ophthalmology	5	1 per year	none	2025-2068	1.00	-	252.12	-	252	-
	Internal medicine	5	1 per year	none	2025-2068	1.00	-	239.62	-	240	-
	Psychiatry	5	60 over lifetime	none	2025-2068	1.39	-	202.45	-	282	-
	Psychology	5	180 over lifetime	2-3 blocks of 8-12 sessions	2025-2068	4.18	0.58	200.94	175.00	840	102
	Physical therapy	5	12 per year	1 every 4 years	2025-2068	12.00	0.25	326.36	326.36	3,916	82
	Occupational therapy	5	12 per year	1 every 4 years	2025-2068	12.00	0.25	366.16	366.16	4,394	92
	Podiatry	5	8 per year	1 per year	2025-2068	8.00	1.00	235.37	235.37	1,883	235
	Nutrition consultant	5	2 per year	none	2025-2068	2.00	-	133.33	-	267	-
	Vocational rehabilitation evaluation	5	2 over lifetime	none	2025-2068	0.05	-	1,880.55	-	87	-
	Vocational rehabilitation counseling	5	16 over lifetime	none	2025-2068	0.37	-	165.00	-	61	-
	Ergonomic evaluation	5	2 over lifetime	none	2025-2068	0.05	-	2,507.40	-	117	-
	Neuropsychology testing	5	1 over lifetime	none	2025-2068	0.02	-	2,761.28	-	64	-
	Neuropsychology follow-up	5	24 over lifetime	none	2025-2068	0.56	-	219.44	-	122	-
	Neuropsychology cognitive rehabilitation	5	24 over lifetime	none	2025-2068	0.56	-	229.85	-	128	-
	Speech and language evaluation	5	1 over lifetime	none	2025-2068	0.02	-	402.98	-	9	-
	Speech and language cognitive therapy	5	24 over lifetime	none	2025-2068	0.56	-	229.85	-	128	-
	Occupational therapy cognitive evaluation	5	1 over lifetime	none	2025-2068	0.02	-	255.72	-	6	-
	Occupational therapy cognitive therapy	5	24 over lifetime	none	2025-2068	0.56	-	229.85	-	128	-
	Brain injury education	5	24 over lifetime	none	2025-2068	0.56	-	79.60	-	44	-
	Group therapy	5	72 over lifetime	none	2025-2068	1.67	-	55.72	-	93	-
	Shoulder MRI reading fee	5	2 over lifetime	none	2025-2068	0.05	-	839.06	-	39	-
	Hand MRI reading fee	5	2 over lifetime	none	2025-2068	0.05	-	632.82	-	29	-
	Foot MRI reading fee	5	2 over lifetime	none	2025-2068	0.05	-	632.82	-	29	-
	CBC	5	1 per year	none	2025-2068	1.00	-	43.78	-	44	-
	Liver profile	5	1 per year	none	2025-2068	1.00	-	50.75	-	51	-
	Renal profile	5	1 per year	none	2025-2068	1.00	-	89.55	-	90	-
	Draw fee	5	1 per year	none	2025-2068	1.00	-	21.89	-	22	-

Physician services	2025-2026	\$ 17,368	\$ 1,176
	2027-2029	16,156	1,176
	2030-2068	14,900	1,176

Hospital Services: **Hospital Services**

	Semi-permanent tattoo for right eyelid	8 & 9	1 per year	none	2025-2068	1.00	-	\$ 774.78	\$ -	\$ 775	\$ -
	Emergency room visits	8 & 9	1 every 5 years	none	2025-2068	0.20	-	1,599.11	-	320	-
	Shoulder x-ray	8 & 9	1 every 5 years	none	2025-2068	0.20	-	282.58	-	57	-
	Shoulder MRI without contrast	8 & 9	2 over lifetime	none	2025-2068	0.05	-	5,940.16	-	276	-
	Hand x-ray	8 & 9	1 every 5 years	none	2025-2068	0.20	-	288.56	-	58	-
	Hand MRI without contrast	9 & 9	2 over lifetime	none	2025-2068	0.05	-	3,860.60	-	179	-
	Foot x-ray	10 & 9	1 every 5 years	none	2025-2068	0.20	-	165.18	-	33	-
	Foot MRI without contrast	11 & 9	2 over lifetime	none	2025-2068	0.05	-	4,107.36	-	191	-

Hospital services	2025-2068	\$ 1,888	\$ -
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Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC
Future Medical and Other Costs and Frequencies

Years to life expectancy at valuation date 43.03

		<u>Schedule</u>	Snyder <u>Units</u>	Johnson Units	<u>Period</u>	Snyder <u>Annual Frequency</u>	Johnson <u>Annual Frequency</u>	Snyder <u>Unit Cost</u>	Johnson <u>Unit Cost</u>	Snyder <u>Annual Cost</u>	Johnson <u>Annual Cost</u>
<u>Medications</u>											
Medications:	Neurontin	7	3 per day	none	2025-2068	1,095.00	-	\$ 1.87	\$ -	\$ 2,048	\$ -
	Baclofen	7	3 per day	none	2025-2068	1,095.00	-	0.58	-	635	-
	Duloxetine	7	1 per day	none	2025-2068	365.00	-	6.50	-	2,373	-
	Lansoprazole	7	15 per month	none	2025-2068	180.00	-	0.43	-	77	-
	Zolpidem Tartrate	7	1 per day	none	2025-2068	365.00	-	2.13	-	777	-
Medications					2025-2068					\$ 5,910	\$ -
<u>Inflationary Items:</u>											
Inflationary Items:	Travel to burn center	8 & 9	6 per year	none	2025-2029	6.00	-	\$ 496.42	\$ -	\$ 2,979	\$ -
	Travel to burn center	8 & 9	1 per year	none	2030-2068	1.00	-	496.42	-	496	-
	Travel for secondary scarring alopecia-hair transplantation	8 & 9	6 per year	none	2025-2026	6.00	-	496.42	-	2,979	-
	Motorized scooter maintenance	8 & 9	34 times	none	2026-2068	0.79	-	218.90	-	173	-
	All terrain scooter maintenance	8 & 9	34 times	none	2026-2068	0.79	-	534.90	-	423	-
	Resta lite	8 & 9	1 per month	1 per month	2025-2068	12.00	12.00	17.69	17.69	212	212
	Vaseline	8 & 9	1 per month	1 per month	2025-2068	12.00	12.00	6.29	6.29	75	75
	Cut protective gloves	8 & 9	1 every 3 months	12 per year	2025-2068	4.00	12.00	143.04	5.50	572	66
	Sun/UV protective clothing	8 & 9	1 every 3 months	none	2025-2068	4.00	-	243.00	-	972	-
	Sunscreen	8 & 9	1 per month	1 per month	2025-2068	12.00	12.00	38.99	16.46	468	197
	Toyota Sienna (2024) initial purchase	8 & 9	1	none	2025	1.00	-	47,035.00	-	47,035	-
	Toyota Sienna replacement less trade in value	8 & 9	1 every 5 years	none	2030-2068	0.20	-	15,250.00	-	3,050	-
	Van modifications	8 & 9	1 every 5 years	none	2025-2068	0.20	-	35,625.00	-	7,125	-
	Van modification maintenance	8 & 9	1 per year	none	2025-2068	1.00	-	362.50	-	363	-
	Automobile Association membership	8 & 9	1 per year	none	2025-2068	1.00	-	99.99	-	100	-
	Handicapped home modifications	8 & 9	1 per year	none	2025	1.00	-	32,956.52	-	32,957	-
	Home security monitoring	8 & 9	1 per month	none	2025-2068	12.00	-	49.32	-	592	-
	Housekeeper - heavy housekeeping	8 & 9	16 hours per month	8 hours per month	2025-2068	192.00	96.00	32.50	40.00	6,240	3,840
	Personal care attendant (groceries, shopping, light cleaning)	8 & 9	20 hours per week	none	2025-2068	1,040.00	-	29.95	-	31,148	-
	Home maintenance	8 & 9	5 hours per month	none	2025-2068	60.00	-	64.37	-	3,862	-
	Phoenix World Burn Congress registration	8 & 9	10 over lifetime	1 time	2025-2068	0.23	0.02	4,000.00	4,000.00	929	93
	Burn support group at Salt Lake City Burn Center	8 & 9	6 per year	none	2025-2029	6.00	-	700.00	-	4,200	-
Inflationary items					2025 only					\$ 79,992	\$ -
					2025					62,816	4,484
					2026					63,411	4,484
					2027-2029					60,433	4,484
					2030-2068					56,801	4,484
<u>Medical Supplies</u>											
Medical Supplies:	Shower chair	10 & 11	Every 5 years	none	2025-2068	0.20	-	\$ 70.57	\$ -	\$ 14	\$ -
	Long handled lotion applicator	10 & 11	1 per year	none	2025-2068	1.00	-	10.49	-	10	-
	Long handled shower sponge	10 & 11	1 per year	none	2025-2068	1.00	-	12.98	-	13	-
	Assistive reacher	10 & 11	Every 3 years	none	2025-2068	0.33	-	18.00	-	6	-
	Motorized scooter	10 & 11	Every 5 years	none	2025-2068	0.20	-	2,189.00	-	438	-
	All terrain scooter	10 & 11	Every 5 years	none	2025-2068	0.20	-	5,349.00	-	1,070	-
	Scooter backpack	10 & 11	Every 2 years	none	2025-2068	0.50	-	62.00	-	31	-
	Portable ramps	10 & 11	Every 10 years	none	2025-2068	0.10	-	497.32	-	50	-
	Adjustable bed with elevating head	10 & 11	Every 8.5 years	none	2025-2068	0.12	-	4,048.00	-	476	-
	Walker	10 & 11	Every 5 years	none	2037-2068	0.20	-	71.52	-	14	-
	Medical supplies					2025-2036					\$ 2,108
					2037-2068					2,122	-

Schedule 5

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Physician Services Costs - Snyder

Net discount rate (Schedule 3)

2.19%

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Physician Services Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 14,418	0.9822	\$ 14,161	\$ 14,161
12/31/2026	39.80	1.00	1.83	17,368	0.9612	16,694	30,855
12/31/2027	40.80	1.00	2.83	16,156	0.9406	15,196	46,051
12/31/2028	41.80	1.00	3.83	16,156	0.9205	14,871	60,922
12/31/2029	42.80	1.00	4.83	16,156	0.9008	14,552	75,475
12/31/2030	43.80	1.00	5.83	14,900	0.8815	13,134	88,609
12/31/2031	44.80	1.00	6.83	14,900	0.8626	12,853	101,462
12/31/2032	45.80	1.00	7.83	14,900	0.8442	12,578	114,040
12/31/2033	46.80	1.00	8.83	14,900	0.8261	12,309	126,348
12/31/2034	47.80	1.00	9.83	14,900	0.8084	12,045	138,394
12/31/2035	48.80	1.00	10.83	14,900	0.7911	11,787	150,181
12/31/2036	49.80	1.00	11.83	14,900	0.7742	11,535	161,716
12/31/2037	50.80	1.00	12.83	14,900	0.7576	11,288	173,004
12/31/2038	51.80	1.00	13.83	14,900	0.7414	11,047	184,051
12/31/2039	52.80	1.00	14.83	14,900	0.7255	10,810	194,861
12/31/2040	53.80	1.00	15.83	14,900	0.7100	10,579	205,440
12/31/2041	54.80	1.00	16.83	14,900	0.6948	10,352	215,792
12/31/2042	55.80	1.00	17.83	14,900	0.6799	10,131	225,923
12/31/2043	56.80	1.00	18.83	14,900	0.6654	9,914	235,836
12/31/2044	57.80	1.00	19.83	14,900	0.6511	9,702	245,538
12/31/2045	58.80	1.00	20.83	14,900	0.6372	9,494	255,032
12/31/2046	59.80	1.00	21.83	14,900	0.6235	9,291	264,323
12/31/2047	60.80	1.00	22.83	14,900	0.6102	9,092	273,415
12/31/2048	61.80	1.00	23.83	14,900	0.5971	8,897	282,312
12/31/2049	62.80	1.00	24.83	14,900	0.5844	8,707	291,019
12/31/2050	63.80	1.00	25.83	14,900	0.5718	8,520	299,539
12/31/2051	64.80	1.00	26.83	14,900	0.5596	8,338	307,877
12/31/2052	65.80	1.00	27.83	14,900	0.5476	8,160	316,037
12/31/2053	66.80	1.00	28.83	14,900	0.5359	7,985	324,022
12/31/2054	67.80	1.00	29.83	14,900	0.5244	7,814	331,836
12/31/2055	68.80	1.00	30.83	14,900	0.5132	7,647	339,483
12/31/2056	69.80	1.00	31.83	14,900	0.5022	7,483	346,966
12/31/2057	70.80	1.00	32.83	14,900	0.4915	7,323	354,289
12/31/2058	71.80	1.00	33.83	14,900	0.4810	7,166	361,455
12/31/2059	72.80	1.00	34.83	14,900	0.4707	7,013	368,468
12/31/2060	73.80	1.00	35.83	14,900	0.4606	6,863	375,331
12/31/2061	74.80	1.00	36.83	14,900	0.4507	6,716	382,047
12/31/2062	75.80	1.00	37.83	14,900	0.4411	6,572	388,619
12/31/2063	76.80	1.00	38.83	14,900	0.4316	6,431	395,050
12/31/2064	77.80	1.00	39.83	14,900	0.4224	6,294	401,344
12/31/2065	78.80	1.00	40.83	14,900	0.4134	6,159	407,503
12/31/2066	79.80	1.00	41.83	14,900	0.4045	6,027	413,530
12/31/2067	80.80	1.00	42.83	14,900	0.3959	5,898	419,428
3/16/2068	81.00	0.20	43.03	2,980	0.3941	1,175	420,603
Total		<u>43.03</u>		<u>\$ 649,434</u>		<u>\$ 420,603</u>	

Schedule 5A

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Physician Services Costs - Johnson

Net discount rate (Schedule 3)

2.19%

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Physician Services Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 976	0.9822	\$ 959	\$ 959
12/31/2026	39.80	1.00	1.83	1,176	0.9612	1,130	2,089
12/31/2027	40.80	1.00	2.83	1,176	0.9406	1,106	3,195
12/31/2028	41.80	1.00	3.83	1,176	0.9205	1,082	4,277
12/31/2029	42.80	1.00	4.83	1,176	0.9008	1,059	5,336
12/31/2030	43.80	1.00	5.83	1,176	0.8815	1,036	6,372
12/31/2031	44.80	1.00	6.83	1,176	0.8626	1,014	7,387
12/31/2032	45.80	1.00	7.83	1,176	0.8442	993	8,379
12/31/2033	46.80	1.00	8.83	1,176	0.8261	971	9,351
12/31/2034	47.80	1.00	9.83	1,176	0.8084	950	10,301
12/31/2035	48.80	1.00	10.83	1,176	0.7911	930	11,231
12/31/2036	49.80	1.00	11.83	1,176	0.7742	910	12,141
12/31/2037	50.80	1.00	12.83	1,176	0.7576	891	13,032
12/31/2038	51.80	1.00	13.83	1,176	0.7414	872	13,904
12/31/2039	52.80	1.00	14.83	1,176	0.7255	853	14,757
12/31/2040	53.80	1.00	15.83	1,176	0.7100	835	15,592
12/31/2041	54.80	1.00	16.83	1,176	0.6948	817	16,409
12/31/2042	55.80	1.00	17.83	1,176	0.6799	799	17,208
12/31/2043	56.80	1.00	18.83	1,176	0.6654	782	17,990
12/31/2044	57.80	1.00	19.83	1,176	0.6511	766	18,756
12/31/2045	58.80	1.00	20.83	1,176	0.6372	749	19,505
12/31/2046	59.80	1.00	21.83	1,176	0.6235	733	20,238
12/31/2047	60.80	1.00	22.83	1,176	0.6102	717	20,956
12/31/2048	61.80	1.00	23.83	1,176	0.5971	702	21,658
12/31/2049	62.80	1.00	24.83	1,176	0.5844	687	22,345
12/31/2050	63.80	1.00	25.83	1,176	0.5718	672	23,017
12/31/2051	64.80	1.00	26.83	1,176	0.5596	658	23,675
12/31/2052	65.80	1.00	27.83	1,176	0.5476	644	24,319
12/31/2053	66.80	1.00	28.83	1,176	0.5359	630	24,949
12/31/2054	67.80	1.00	29.83	1,176	0.5244	617	25,566
12/31/2055	68.80	1.00	30.83	1,176	0.5132	603	26,169
12/31/2056	69.80	1.00	31.83	1,176	0.5022	590	26,759
12/31/2057	70.80	1.00	32.83	1,176	0.4915	578	27,337
12/31/2058	71.80	1.00	33.83	1,176	0.4810	565	27,903
12/31/2059	72.80	1.00	34.83	1,176	0.4707	553	28,456
12/31/2060	73.80	1.00	35.83	1,176	0.4606	542	28,998
12/31/2061	74.80	1.00	36.83	1,176	0.4507	530	29,528
12/31/2062	75.80	1.00	37.83	1,176	0.4411	519	30,046
12/31/2063	76.80	1.00	38.83	1,176	0.4316	508	30,554
12/31/2064	77.80	1.00	39.83	1,176	0.4224	497	31,050
12/31/2065	78.80	1.00	40.83	1,176	0.4134	486	31,536
12/31/2066	79.80	1.00	41.83	1,176	0.4045	476	32,012
12/31/2067	80.80	1.00	42.83	1,176	0.3959	465	32,477
3/16/2068	81.00	0.20	43.03	235	0.3941	93	32,570
Total		<u>43.03</u>		<u>\$ 50,593</u>		<u>\$ 32,570</u>	

Schedule 6

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Hospital Services Costs - Snyder

Net discount rate (Schedule 3)

-0.68%

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Hospital Services Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 1,567	1.0057	\$ 1,576	\$ 1,576
12/31/2026	39.80	1.00	1.83	1,888	1.0125	1,912	3,488
12/31/2027	40.80	1.00	2.83	1,888	1.0194	1,925	5,413
12/31/2028	41.80	1.00	3.83	1,888	1.0264	1,938	7,351
12/31/2029	42.80	1.00	4.83	1,888	1.0333	1,951	9,302
12/31/2030	43.80	1.00	5.83	1,888	1.0404	1,965	11,267
12/31/2031	44.80	1.00	6.83	1,888	1.0475	1,978	13,245
12/31/2032	45.80	1.00	7.83	1,888	1.0546	1,991	15,236
12/31/2033	46.80	1.00	8.83	1,888	1.0618	2,005	17,241
12/31/2034	47.80	1.00	9.83	1,888	1.0690	2,019	19,260
12/31/2035	48.80	1.00	10.83	1,888	1.0763	2,032	21,292
12/31/2036	49.80	1.00	11.83	1,888	1.0837	2,046	23,338
12/31/2037	50.80	1.00	12.83	1,888	1.0910	2,060	25,398
12/31/2038	51.80	1.00	13.83	1,888	1.0985	2,074	27,473
12/31/2039	52.80	1.00	14.83	1,888	1.1060	2,088	29,561
12/31/2040	53.80	1.00	15.83	1,888	1.1135	2,103	31,663
12/31/2041	54.80	1.00	16.83	1,888	1.1211	2,117	33,780
12/31/2042	55.80	1.00	17.83	1,888	1.1287	2,131	35,912
12/31/2043	56.80	1.00	18.83	1,888	1.1364	2,146	38,057
12/31/2044	57.80	1.00	19.83	1,888	1.1442	2,160	40,218
12/31/2045	58.80	1.00	20.83	1,888	1.1520	2,175	42,393
12/31/2046	59.80	1.00	21.83	1,888	1.1598	2,190	44,583
12/31/2047	60.80	1.00	22.83	1,888	1.1677	2,205	46,788
12/31/2048	61.80	1.00	23.83	1,888	1.1757	2,220	49,008
12/31/2049	62.80	1.00	24.83	1,888	1.1837	2,235	51,243
12/31/2050	63.80	1.00	25.83	1,888	1.1917	2,250	53,493
12/31/2051	64.80	1.00	26.83	1,888	1.1999	2,266	55,759
12/31/2052	65.80	1.00	27.83	1,888	1.2080	2,281	58,040
12/31/2053	66.80	1.00	28.83	1,888	1.2163	2,297	60,337
12/31/2054	67.80	1.00	29.83	1,888	1.2246	2,312	62,649
12/31/2055	68.80	1.00	30.83	1,888	1.2329	2,328	64,977
12/31/2056	69.80	1.00	31.83	1,888	1.2413	2,344	67,321
12/31/2057	70.80	1.00	32.83	1,888	1.2498	2,360	69,681
12/31/2058	71.80	1.00	33.83	1,888	1.2583	2,376	72,057
12/31/2059	72.80	1.00	34.83	1,888	1.2669	2,392	74,449
12/31/2060	73.80	1.00	35.83	1,888	1.2755	2,408	76,857
12/31/2061	74.80	1.00	36.83	1,888	1.2842	2,425	79,282
12/31/2062	75.80	1.00	37.83	1,888	1.2929	2,441	81,724
12/31/2063	76.80	1.00	38.83	1,888	1.3018	2,458	84,182
12/31/2064	77.80	1.00	39.83	1,888	1.3106	2,475	86,656
12/31/2065	78.80	1.00	40.83	1,888	1.3196	2,492	89,148
12/31/2066	79.80	1.00	41.83	1,888	1.3285	2,509	91,657
12/31/2067	80.80	1.00	42.83	1,888	1.3376	2,526	94,182
3/16/2068	81.00	0.20	43.03	378	1.3394	506	94,688
Total		<u>43.03</u>		<u>\$ 81,251</u>		<u>\$ 94,688</u>	

Schedule 7

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC
 Present Value of Prescription Medication Costs - Snyder

Net discount rate (Schedule 3)

1.97%

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Prescription Medication Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 4,906	0.9839	\$ 4,827	\$ 4,827
12/31/2026	39.80	1.00	1.83	5,910	0.9649	5,702	10,530
12/31/2027	40.80	1.00	2.83	5,910	0.9462	5,592	16,122
12/31/2028	41.80	1.00	3.83	5,910	0.9279	5,484	21,606
12/31/2029	42.80	1.00	4.83	5,910	0.9099	5,378	26,984
12/31/2030	43.80	1.00	5.83	5,910	0.8923	5,274	32,257
12/31/2031	44.80	1.00	6.83	5,910	0.8751	5,172	37,429
12/31/2032	45.80	1.00	7.83	5,910	0.8581	5,072	42,501
12/31/2033	46.80	1.00	8.83	5,910	0.8415	4,974	47,474
12/31/2034	47.80	1.00	9.83	5,910	0.8252	4,877	52,352
12/31/2035	48.80	1.00	10.83	5,910	0.8093	4,783	57,134
12/31/2036	49.80	1.00	11.83	5,910	0.7936	4,690	61,825
12/31/2037	50.80	1.00	12.83	5,910	0.7783	4,600	66,424
12/31/2038	51.80	1.00	13.83	5,910	0.7632	4,511	70,935
12/31/2039	52.80	1.00	14.83	5,910	0.7484	4,423	75,358
12/31/2040	53.80	1.00	15.83	5,910	0.7339	4,338	79,696
12/31/2041	54.80	1.00	16.83	5,910	0.7197	4,254	83,950
12/31/2042	55.80	1.00	17.83	5,910	0.7058	4,171	88,121
12/31/2043	56.80	1.00	18.83	5,910	0.6922	4,091	92,212
12/31/2044	57.80	1.00	19.83	5,910	0.6788	4,012	96,223
12/31/2045	58.80	1.00	20.83	5,910	0.6656	3,934	100,157
12/31/2046	59.80	1.00	21.83	5,910	0.6528	3,858	104,015
12/31/2047	60.80	1.00	22.83	5,910	0.6401	3,783	107,798
12/31/2048	61.80	1.00	23.83	5,910	0.6277	3,710	111,508
12/31/2049	62.80	1.00	24.83	5,910	0.6156	3,638	115,147
12/31/2050	63.80	1.00	25.83	5,910	0.6037	3,568	118,714
12/31/2051	64.80	1.00	26.83	5,910	0.5920	3,499	122,213
12/31/2052	65.80	1.00	27.83	5,910	0.5805	3,431	125,644
12/31/2053	66.80	1.00	28.83	5,910	0.5693	3,365	129,009
12/31/2054	67.80	1.00	29.83	5,910	0.5583	3,300	132,309
12/31/2055	68.80	1.00	30.83	5,910	0.5475	3,236	135,544
12/31/2056	69.80	1.00	31.83	5,910	0.5369	3,173	138,717
12/31/2057	70.80	1.00	32.83	5,910	0.5265	3,112	141,829
12/31/2058	71.80	1.00	33.83	5,910	0.5163	3,051	144,881
12/31/2059	72.80	1.00	34.83	5,910	0.5063	2,992	147,873
12/31/2060	73.80	1.00	35.83	5,910	0.4965	2,935	150,808
12/31/2061	74.80	1.00	36.83	5,910	0.4869	2,878	153,685
12/31/2062	75.80	1.00	37.83	5,910	0.4775	2,822	156,507
12/31/2063	76.80	1.00	38.83	5,910	0.4683	2,767	159,275
12/31/2064	77.80	1.00	39.83	5,910	0.4592	2,714	161,989
12/31/2065	78.80	1.00	40.83	5,910	0.4503	2,661	164,650
12/31/2066	79.80	1.00	41.83	5,910	0.4416	2,610	167,260
12/31/2067	80.80	1.00	42.83	5,910	0.4331	2,559	169,819
3/16/2068	81.00	0.20	43.03	1,182	0.4314	510	170,329
Total		<u>43.03</u>		<u>\$ 254,312</u>		<u>\$ 170,329</u>	

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Inflationary Items Costs - Snyder

Net discount rate (Schedule 3)								2.16%		
		Time	Total	Inflationary	Average		Present		Cumulative	
Date	Age	Period	Time	Items	Vehicle	Net	Value	Present	Present	
			Period	Costs	Cost	Cost	Factor	Value	Value	
3/3/2025	37.97		-	\$ 79,992	\$ (37,053)	\$ 42,939	1.0000	\$ 42,939	\$ 42,939	
12/31/2025	38.80	0.83	0.83	52,146	-	52,146	0.9824	51,228	94,167	
12/31/2026	39.80	1.00	1.83	63,411	-	63,411	0.9616	60,978	155,145	
12/31/2027	40.80	1.00	2.83	60,433	-	60,433	0.9413	56,884	212,029	
12/31/2028	41.80	1.00	3.83	60,433	-	60,433	0.9214	55,680	267,709	
12/31/2029	42.80	1.00	4.83	60,433	-	60,433	0.9019	54,502	322,212	
12/31/2030	43.80	1.00	5.83	56,801	(4,842)	51,959	0.8828	45,869	368,080	
12/31/2031	44.80	1.00	6.83	56,801	(4,842)	51,959	0.8641	44,898	412,979	
12/31/2032	45.80	1.00	7.83	56,801	(4,842)	51,959	0.8458	43,948	456,927	
12/31/2033	46.80	1.00	8.83	56,801	(4,842)	51,959	0.8279	43,019	499,946	
12/31/2034	47.80	1.00	9.83	56,801	(4,842)	51,959	0.8104	42,108	542,054	
12/31/2035	48.80	1.00	10.83	56,801	(4,842)	51,959	0.7933	41,217	583,271	
12/31/2036	49.80	1.00	11.83	56,801	(4,842)	51,959	0.7765	40,345	623,617	
12/31/2037	50.80	1.00	12.83	56,801	(4,842)	51,959	0.7601	39,492	663,109	
12/31/2038	51.80	1.00	13.83	56,801	(4,842)	51,959	0.7440	38,656	701,765	
12/31/2039	52.80	1.00	14.83	56,801	(4,842)	51,959	0.7282	37,838	739,603	
12/31/2040	53.80	1.00	15.83	56,801	(4,842)	51,959	0.7128	37,038	776,641	
12/31/2041	54.80	1.00	16.83	56,801	(4,842)	51,959	0.6977	36,254	812,896	
12/31/2042	55.80	1.00	17.83	56,801	(4,842)	51,959	0.6830	35,487	848,383	
12/31/2043	56.80	1.00	18.83	56,801	(4,842)	51,959	0.6685	34,736	883,119	
12/31/2044	57.80	1.00	19.83	56,801	(4,842)	51,959	0.6544	34,001	917,121	
12/31/2045	58.80	1.00	20.83	56,801	(4,842)	51,959	0.6405	33,282	950,403	
12/31/2046	59.80	1.00	21.83	56,801	(4,842)	51,959	0.6270	32,578	982,981	
12/31/2047	60.80	1.00	22.83	56,801	(4,842)	51,959	0.6137	31,889	1,014,869	
12/31/2048	61.80	1.00	23.83	56,801	(4,842)	51,959	0.6007	31,214	1,046,083	
12/31/2049	62.80	1.00	24.83	56,801	(4,842)	51,959	0.5880	30,554	1,076,637	
12/31/2050	63.80	1.00	25.83	56,801	(4,842)	51,959	0.5756	29,907	1,106,544	
12/31/2051	64.80	1.00	26.83	56,801	(4,842)	51,959	0.5634	29,274	1,135,819	
12/31/2052	65.80	1.00	27.83	56,801	(4,842)	51,959	0.5515	28,655	1,164,474	
12/31/2053	66.80	1.00	28.83	56,801	(4,842)	51,959	0.5398	28,049	1,192,522	
12/31/2054	67.80	1.00	29.83	56,801	(4,842)	51,959	0.5284	27,455	1,219,978	
12/31/2055	68.80	1.00	30.83	56,801	(4,842)	51,959	0.5172	26,874	1,246,852	
12/31/2056	69.80	1.00	31.83	56,801	(4,842)	51,959	0.5063	26,306	1,273,158	
12/31/2057	70.80	1.00	32.83	56,801	(4,842)	51,959	0.4956	25,749	1,298,907	
12/31/2058	71.80	1.00	33.83	56,801	(4,842)	51,959	0.4851	25,205	1,324,112	
12/31/2059	72.80	1.00	34.83	56,801	(4,842)	51,959	0.4748	24,671	1,348,783	
12/31/2060	73.80	1.00	35.83	56,801	(4,842)	51,959	0.4648	24,149	1,372,933	
12/31/2061	74.80	1.00	36.83	56,801	(4,842)	51,959	0.4549	23,638	1,396,571	
12/31/2062	75.80	1.00	37.83	56,801	(4,842)	51,959	0.4453	23,138	1,419,709	
12/31/2063	76.80	1.00	38.83	56,801	(4,842)	51,959	0.4359	22,649	1,442,358	
12/31/2064	77.80	1.00	39.83	56,801	(4,842)	51,959	0.4267	22,170	1,464,527	
12/31/2065	78.80	1.00	40.83	56,801	(4,842)	51,959	0.4176	21,700	1,486,228	
12/31/2066	79.80	1.00	41.83	56,801	(4,842)	51,959	0.4088	21,241	1,507,469	
12/31/2067	80.80	1.00	42.83	56,801	(4,842)	51,959	0.4002	20,792	1,528,261	
3/16/2068	81.00	0.20	43.03	11,360	(968)	10,392	0.3985	4,141	1,532,402	
3/16/2068				(32,957)		(32,957)	0.3985	(13,132)	1,519,270	
Total		43.03		\$ 2,513,681	\$ (222,005)	\$ 2,291,676		\$ 1,519,270		

Schedule 8A

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Inflationary Items Costs - Johnson

Net discount rate (Schedule 3)

2.16%

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Inflationary Items Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-	\$ -	1.0000	\$ -	\$ -
12/31/2025	38.80	0.83	0.83	3,722	0.9824	3,657	3,657
12/31/2026	39.80	1.00	1.83	4,484	0.9616	4,312	7,969
12/31/2027	40.80	1.00	2.83	4,484	0.9413	4,221	12,190
12/31/2028	41.80	1.00	3.83	4,484	0.9214	4,132	16,321
12/31/2029	42.80	1.00	4.83	4,484	0.9019	4,044	20,366
12/31/2030	43.80	1.00	5.83	4,484	0.8828	3,959	24,324
12/31/2031	44.80	1.00	6.83	4,484	0.8641	3,875	28,199
12/31/2032	45.80	1.00	7.83	4,484	0.8458	3,793	31,992
12/31/2033	46.80	1.00	8.83	4,484	0.8279	3,713	35,704
12/31/2034	47.80	1.00	9.83	4,484	0.8104	3,634	39,338
12/31/2035	48.80	1.00	10.83	4,484	0.7933	3,557	42,895
12/31/2036	49.80	1.00	11.83	4,484	0.7765	3,482	46,377
12/31/2037	50.80	1.00	12.83	4,484	0.7601	3,408	49,786
12/31/2038	51.80	1.00	13.83	4,484	0.7440	3,336	53,122
12/31/2039	52.80	1.00	14.83	4,484	0.7282	3,266	56,387
12/31/2040	53.80	1.00	15.83	4,484	0.7128	3,196	59,584
12/31/2041	54.80	1.00	16.83	4,484	0.6977	3,129	62,712
12/31/2042	55.80	1.00	17.83	4,484	0.6830	3,063	65,775
12/31/2043	56.80	1.00	18.83	4,484	0.6685	2,998	68,773
12/31/2044	57.80	1.00	19.83	4,484	0.6544	2,934	71,707
12/31/2045	58.80	1.00	20.83	4,484	0.6405	2,872	74,580
12/31/2046	59.80	1.00	21.83	4,484	0.6270	2,812	77,391
12/31/2047	60.80	1.00	22.83	4,484	0.6137	2,752	80,143
12/31/2048	61.80	1.00	23.83	4,484	0.6007	2,694	82,837
12/31/2049	62.80	1.00	24.83	4,484	0.5880	2,637	85,474
12/31/2050	63.80	1.00	25.83	4,484	0.5756	2,581	88,055
12/31/2051	64.80	1.00	26.83	4,484	0.5634	2,526	90,581
12/31/2052	65.80	1.00	27.83	4,484	0.5515	2,473	93,054
12/31/2053	66.80	1.00	28.83	4,484	0.5398	2,421	95,475
12/31/2054	67.80	1.00	29.83	4,484	0.5284	2,369	97,844
12/31/2055	68.80	1.00	30.83	4,484	0.5172	2,319	100,164
12/31/2056	69.80	1.00	31.83	4,484	0.5063	2,270	102,434
12/31/2057	70.80	1.00	32.83	4,484	0.4956	2,222	104,656
12/31/2058	71.80	1.00	33.83	4,484	0.4851	2,175	106,831
12/31/2059	72.80	1.00	34.83	4,484	0.4748	2,129	108,961
12/31/2060	73.80	1.00	35.83	4,484	0.4648	2,084	111,045
12/31/2061	74.80	1.00	36.83	4,484	0.4549	2,040	113,085
12/31/2062	75.80	1.00	37.83	4,484	0.4453	1,997	115,082
12/31/2063	76.80	1.00	38.83	4,484	0.4359	1,955	117,036
12/31/2064	77.80	1.00	39.83	4,484	0.4267	1,913	118,950
12/31/2065	78.80	1.00	40.83	4,484	0.4176	1,873	120,822
12/31/2066	79.80	1.00	41.83	4,484	0.4088	1,833	122,656
12/31/2067	80.80	1.00	42.83	4,484	0.4002	1,794	124,450
3/16/2068	81.00	0.20	43.03	897	0.3985	357	124,807
3/16/2068				-	0.3985	-	124,807
Total		<u>43.03</u>		<u>\$ 192,954</u>		<u>\$ 124,807</u>	

Schedule 9

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Medical Supplies Costs - Snyder

Net discount rate (Schedule 3)

2.54%

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Medical Supplies Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 1,750	0.9794	\$ 1,714	\$ 1,714
12/31/2026	39.80	1.00	1.83	2,108	0.9551	2,014	3,728
12/31/2027	40.80	1.00	2.83	2,108	0.9315	1,964	5,691
12/31/2028	41.80	1.00	3.83	2,108	0.9084	1,915	7,606
12/31/2029	42.80	1.00	4.83	2,108	0.8859	1,868	9,474
12/31/2030	43.80	1.00	5.83	2,108	0.8640	1,821	11,296
12/31/2031	44.80	1.00	6.83	2,108	0.8426	1,776	13,072
12/31/2032	45.80	1.00	7.83	2,108	0.8217	1,732	14,804
12/31/2033	46.80	1.00	8.83	2,108	0.8014	1,689	16,494
12/31/2034	47.80	1.00	9.83	2,108	0.7815	1,648	18,141
12/31/2035	48.80	1.00	10.83	2,108	0.7622	1,607	19,748
12/31/2036	49.80	1.00	11.83	2,108	0.7433	1,567	21,315
12/31/2037	50.80	1.00	12.83	2,122	0.7249	1,539	22,854
12/31/2038	51.80	1.00	13.83	2,122	0.7070	1,501	24,354
12/31/2039	52.80	1.00	14.83	2,122	0.6895	1,463	25,818
12/31/2040	53.80	1.00	15.83	2,122	0.6724	1,427	27,245
12/31/2041	54.80	1.00	16.83	2,122	0.6557	1,392	28,637
12/31/2042	55.80	1.00	17.83	2,122	0.6395	1,357	29,994
12/31/2043	56.80	1.00	18.83	2,122	0.6237	1,324	31,318
12/31/2044	57.80	1.00	19.83	2,122	0.6082	1,291	32,609
12/31/2045	58.80	1.00	20.83	2,122	0.5932	1,259	33,867
12/31/2046	59.80	1.00	21.83	2,122	0.5785	1,228	35,095
12/31/2047	60.80	1.00	22.83	2,122	0.5642	1,197	36,293
12/31/2048	61.80	1.00	23.83	2,122	0.5502	1,168	37,460
12/31/2049	62.80	1.00	24.83	2,122	0.5366	1,139	38,599
12/31/2050	63.80	1.00	25.83	2,122	0.5233	1,111	39,710
12/31/2051	64.80	1.00	26.83	2,122	0.5103	1,083	40,793
12/31/2052	65.80	1.00	27.83	2,122	0.4977	1,056	41,849
12/31/2053	66.80	1.00	28.83	2,122	0.4854	1,030	42,879
12/31/2054	67.80	1.00	29.83	2,122	0.4733	1,005	43,884
12/31/2055	68.80	1.00	30.83	2,122	0.4616	980	44,864
12/31/2056	69.80	1.00	31.83	2,122	0.4502	955	45,819
12/31/2057	70.80	1.00	32.83	2,122	0.4390	932	46,751
12/31/2058	71.80	1.00	33.83	2,122	0.4282	909	47,660
12/31/2059	72.80	1.00	34.83	2,122	0.4176	886	48,546
12/31/2060	73.80	1.00	35.83	2,122	0.4072	864	49,410
12/31/2061	74.80	1.00	36.83	2,122	0.3971	843	50,253
12/31/2062	75.80	1.00	37.83	2,122	0.3873	822	51,075
12/31/2063	76.80	1.00	38.83	2,122	0.3777	802	51,877
12/31/2064	77.80	1.00	39.83	2,122	0.3684	782	52,659
12/31/2065	78.80	1.00	40.83	2,122	0.3592	762	53,421
12/31/2066	79.80	1.00	41.83	2,122	0.3503	744	54,165
12/31/2067	80.80	1.00	42.83	2,122	0.3417	725	54,890
3/16/2068	81.00	0.20	43.03	424	0.3400	144	55,035
Total		<u>43.03</u>		<u>\$ 91,160</u>		<u>\$ 55,035</u>	

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC
Summary Present Value of Future Medical Costs

<u>Present Value of Costs in Reports:</u>	<u>Schedule</u>	<u>Present Value</u> (Rounded)	
		<u>Snyder</u>	<u>Johnson</u>
Physician Services	5 & 5A	\$ 421,000	\$ 33,000
Hospital Services Costs	6	\$ 95,000	\$ -
Prescription Medication Costs	7	\$ 170,000	\$ -
Inflationary Item Costs	8 & 8A	\$ 1,519,000	\$ 125,000
Medical Supplies Costs	9	\$ 55,000	\$ -
Total present value of future medical & other costs		<u><u>\$ 2,260,000</u></u>	<u><u>\$ 158,000</u></u>

Present Value of Potential Costs:

Potential laser treatments	11A-11D	\$ 1,350	\$ 150,000
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Schedule 11A

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Potential Laser Treatment Costs - One Per Year - Johnson

Net discount rate (Schedule 3)

2.19%

Annual average cost

\$ 1,350

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Laser Treatment Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 1,350	0.9822	\$ 1,326	\$ 1,326
12/31/2026	39.80	1.00	1.83	1,350	0.9612	1,298	2,624
12/31/2027	40.80	1.00	2.83	1,350	0.9406	1,270	3,893
12/31/2028	41.80	1.00	3.83	1,350	0.9205	1,243	5,136
12/31/2029	42.80	1.00	4.83	1,350	0.9008	1,216	6,352
12/31/2030	43.80	1.00	5.83	1,350	0.8815	1,190	7,542
12/31/2031	44.80	1.00	6.83	1,350	0.8626	1,165	8,707
12/31/2032	45.80	1.00	7.83	1,350	0.8442	1,140	9,846
12/31/2033	46.80	1.00	8.83	1,350	0.8261	1,115	10,961
12/31/2034	47.80	1.00	9.83	1,350	0.8084	1,091	12,053
12/31/2035	48.80	1.00	10.83	1,350	0.7911	1,068	13,121
12/31/2036	49.80	1.00	11.83	1,350	0.7742	1,045	14,166
12/31/2037	50.80	1.00	12.83	1,350	0.7576	1,023	15,189
12/31/2038	51.80	1.00	13.83	1,350	0.7414	1,001	16,189
12/31/2039	52.80	1.00	14.83	1,350	0.7255	979	17,169
12/31/2040	53.80	1.00	15.83	1,350	0.7100	958	18,127
12/31/2041	54.80	1.00	16.83	1,350	0.6948	938	19,065
12/31/2042	55.80	1.00	17.83	1,350	0.6799	918	19,983
12/31/2043	56.80	1.00	18.83	1,350	0.6654	898	20,881
12/31/2044	57.80	1.00	19.83	1,350	0.6511	879	21,760
12/31/2045	58.80	1.00	20.83	1,350	0.6372	860	22,621
12/31/2046	59.80	1.00	21.83	1,350	0.6235	842	23,462
12/31/2047	60.80	1.00	22.83	1,350	0.6102	824	24,286
12/31/2048	61.80	1.00	23.83	1,350	0.5971	806	25,092
12/31/2049	62.80	1.00	24.83	1,350	0.5844	789	25,881
12/31/2050	63.80	1.00	25.83	1,350	0.5718	772	26,653
12/31/2051	64.80	1.00	26.83	1,350	0.5596	755	27,409
12/31/2052	65.80	1.00	27.83	1,350	0.5476	739	28,148
12/31/2053	66.80	1.00	28.83	1,350	0.5359	723	28,871
12/31/2054	67.80	1.00	29.83	1,350	0.5244	708	29,579
12/31/2055	68.80	1.00	30.83	1,350	0.5132	693	30,272
12/31/2056	69.80	1.00	31.83	1,350	0.5022	678	30,950
12/31/2057	70.80	1.00	32.83	1,350	0.4915	663	31,614
12/31/2058	71.80	1.00	33.83	1,350	0.4810	649	32,263
12/31/2059	72.80	1.00	34.83	1,350	0.4707	635	32,898
12/31/2060	73.80	1.00	35.83	1,350	0.4606	622	33,520
12/31/2061	74.80	1.00	36.83	1,350	0.4507	608	34,129
12/31/2062	75.80	1.00	37.83	1,350	0.4411	595	34,724
12/31/2063	76.80	1.00	38.83	1,350	0.4316	583	35,307
12/31/2064	77.80	1.00	39.83	1,350	0.4224	570	35,877
12/31/2065	78.80	1.00	40.83	1,350	0.4134	558	36,435
12/31/2066	79.80	1.00	41.83	1,350	0.4045	546	36,981
12/31/2067	80.80	1.00	42.83	1,350	0.3959	534	37,516
3/16/2068	81.00	0.20	43.03	270	0.3941	106	37,622
Total		<u>43.03</u>		<u>\$ 58,320</u>		<u>\$ 37,622</u>	

Schedule 11B

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Potential Laser Treatment Costs - Two Per Year - Johnson

Net discount rate (Schedule 3)

2.19%

Annual average cost

\$ 2,700

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Laser Treatment Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 2,700	0.9822	\$ 2,652	\$ 2,652
12/31/2026	39.80	1.00	1.83	2,700	0.9612	2,595	5,247
12/31/2027	40.80	1.00	2.83	2,700	0.9406	2,540	7,787
12/31/2028	41.80	1.00	3.83	2,700	0.9205	2,485	10,272
12/31/2029	42.80	1.00	4.83	2,700	0.9008	2,432	12,704
12/31/2030	43.80	1.00	5.83	2,700	0.8815	2,380	15,084
12/31/2031	44.80	1.00	6.83	2,700	0.8626	2,329	17,413
12/31/2032	45.80	1.00	7.83	2,700	0.8442	2,279	19,692
12/31/2033	46.80	1.00	8.83	2,700	0.8261	2,230	21,923
12/31/2034	47.80	1.00	9.83	2,700	0.8084	2,183	24,105
12/31/2035	48.80	1.00	10.83	2,700	0.7911	2,136	26,241
12/31/2036	49.80	1.00	11.83	2,700	0.7742	2,090	28,332
12/31/2037	50.80	1.00	12.83	2,700	0.7576	2,046	30,377
12/31/2038	51.80	1.00	13.83	2,700	0.7414	2,002	32,379
12/31/2039	52.80	1.00	14.83	2,700	0.7255	1,959	34,338
12/31/2040	53.80	1.00	15.83	2,700	0.7100	1,917	36,255
12/31/2041	54.80	1.00	16.83	2,700	0.6948	1,876	38,131
12/31/2042	55.80	1.00	17.83	2,700	0.6799	1,836	39,966
12/31/2043	56.80	1.00	18.83	2,700	0.6654	1,796	41,763
12/31/2044	57.80	1.00	19.83	2,700	0.6511	1,758	43,521
12/31/2045	58.80	1.00	20.83	2,700	0.6372	1,720	45,241
12/31/2046	59.80	1.00	21.83	2,700	0.6235	1,684	46,925
12/31/2047	60.80	1.00	22.83	2,700	0.6102	1,648	48,572
12/31/2048	61.80	1.00	23.83	2,700	0.5971	1,612	50,185
12/31/2049	62.80	1.00	24.83	2,700	0.5844	1,578	51,762
12/31/2050	63.80	1.00	25.83	2,700	0.5718	1,544	53,306
12/31/2051	64.80	1.00	26.83	2,700	0.5596	1,511	54,817
12/31/2052	65.80	1.00	27.83	2,700	0.5476	1,479	56,296
12/31/2053	66.80	1.00	28.83	2,700	0.5359	1,447	57,743
12/31/2054	67.80	1.00	29.83	2,700	0.5244	1,416	59,159
12/31/2055	68.80	1.00	30.83	2,700	0.5132	1,386	60,544
12/31/2056	69.80	1.00	31.83	2,700	0.5022	1,356	61,900
12/31/2057	70.80	1.00	32.83	2,700	0.4915	1,327	63,227
12/31/2058	71.80	1.00	33.83	2,700	0.4810	1,299	64,526
12/31/2059	72.80	1.00	34.83	2,700	0.4707	1,271	65,797
12/31/2060	73.80	1.00	35.83	2,700	0.4606	1,244	67,040
12/31/2061	74.80	1.00	36.83	2,700	0.4507	1,217	68,257
12/31/2062	75.80	1.00	37.83	2,700	0.4411	1,191	69,448
12/31/2063	76.80	1.00	38.83	2,700	0.4316	1,165	70,614
12/31/2064	77.80	1.00	39.83	2,700	0.4224	1,140	71,754
12/31/2065	78.80	1.00	40.83	2,700	0.4134	1,116	72,870
12/31/2066	79.80	1.00	41.83	2,700	0.4045	1,092	73,962
12/31/2067	80.80	1.00	42.83	2,700	0.3959	1,069	75,031
3/16/2068	81.00	0.20	43.03	540	0.3941	213	75,244
Total		<u>43.03</u>		<u>\$ 116,640</u>		<u>\$ 75,244</u>	

Schedule 11C

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Potential Laser Treatment Costs - Three Per Year - Johnson

Net discount rate (Schedule 3) 2.19%Annual average cost \$ 4,050

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Laser Treatment Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 4,050	0.9822	\$ 3,978	\$ 3,978
12/31/2026	39.80	1.00	1.83	4,050	0.9612	3,893	7,871
12/31/2027	40.80	1.00	2.83	4,050	0.9406	3,809	11,680
12/31/2028	41.80	1.00	3.83	4,050	0.9205	3,728	15,408
12/31/2029	42.80	1.00	4.83	4,050	0.9008	3,648	19,056
12/31/2030	43.80	1.00	5.83	4,050	0.8815	3,570	22,626
12/31/2031	44.80	1.00	6.83	4,050	0.8626	3,494	26,120
12/31/2032	45.80	1.00	7.83	4,050	0.8442	3,419	29,539
12/31/2033	46.80	1.00	8.83	4,050	0.8261	3,346	32,884
12/31/2034	47.80	1.00	9.83	4,050	0.8084	3,274	36,158
12/31/2035	48.80	1.00	10.83	4,050	0.7911	3,204	39,362
12/31/2036	49.80	1.00	11.83	4,050	0.7742	3,135	42,498
12/31/2037	50.80	1.00	12.83	4,050	0.7576	3,068	45,566
12/31/2038	51.80	1.00	13.83	4,050	0.7414	3,003	48,568
12/31/2039	52.80	1.00	14.83	4,050	0.7255	2,938	51,507
12/31/2040	53.80	1.00	15.83	4,050	0.7100	2,875	54,382
12/31/2041	54.80	1.00	16.83	4,050	0.6948	2,814	57,196
12/31/2042	55.80	1.00	17.83	4,050	0.6799	2,754	59,950
12/31/2043	56.80	1.00	18.83	4,050	0.6654	2,695	62,644
12/31/2044	57.80	1.00	19.83	4,050	0.6511	2,637	65,281
12/31/2045	58.80	1.00	20.83	4,050	0.6372	2,581	67,862
12/31/2046	59.80	1.00	21.83	4,050	0.6235	2,525	70,387
12/31/2047	60.80	1.00	22.83	4,050	0.6102	2,471	72,859
12/31/2048	61.80	1.00	23.83	4,050	0.5971	2,418	75,277
12/31/2049	62.80	1.00	24.83	4,050	0.5844	2,367	77,644
12/31/2050	63.80	1.00	25.83	4,050	0.5718	2,316	79,960
12/31/2051	64.80	1.00	26.83	4,050	0.5596	2,266	82,226
12/31/2052	65.80	1.00	27.83	4,050	0.5476	2,218	84,444
12/31/2053	66.80	1.00	28.83	4,050	0.5359	2,170	86,614
12/31/2054	67.80	1.00	29.83	4,050	0.5244	2,124	88,738
12/31/2055	68.80	1.00	30.83	4,050	0.5132	2,078	90,817
12/31/2056	69.80	1.00	31.83	4,050	0.5022	2,034	92,851
12/31/2057	70.80	1.00	32.83	4,050	0.4915	1,990	94,841
12/31/2058	71.80	1.00	33.83	4,050	0.4810	1,948	96,789
12/31/2059	72.80	1.00	34.83	4,050	0.4707	1,906	98,695
12/31/2060	73.80	1.00	35.83	4,050	0.4606	1,865	100,561
12/31/2061	74.80	1.00	36.83	4,050	0.4507	1,825	102,386
12/31/2062	75.80	1.00	37.83	4,050	0.4411	1,786	104,172
12/31/2063	76.80	1.00	38.83	4,050	0.4316	1,748	105,920
12/31/2064	77.80	1.00	39.83	4,050	0.4224	1,711	107,631
12/31/2065	78.80	1.00	40.83	4,050	0.4134	1,674	109,305
12/31/2066	79.80	1.00	41.83	4,050	0.4045	1,638	110,944
12/31/2067	80.80	1.00	42.83	4,050	0.3959	1,603	112,547
3/16/2068	81.00	0.20	43.03	810	0.3941	319	112,866
Total		<u>43.03</u>		<u>\$ 174,960</u>		<u>\$ 112,866</u>	

Schedule 11D

Stephanie Wadsworth, et al. v. Jetson Electric Bikes, LLC

Present Value of Potential Laser Treatment Costs - Three Per Year - Johnson

Net discount rate (Schedule 3)

2.19%

Annual average cost

\$ 5,400

<u>Date</u>	<u>Age</u>	<u>Time Period</u>	<u>Total Time Period</u>	<u>Laser Treatment Costs</u>	<u>Present Value Factor</u>	<u>Present Value</u>	<u>Cumulative Present Value</u>
3/3/2025	37.97		-				
12/31/2025	38.80	0.83	0.83	\$ 5,400	0.9822	\$ 5,304	\$ 5,304
12/31/2026	39.80	1.00	1.83	5,400	0.9612	5,190	10,494
12/31/2027	40.80	1.00	2.83	5,400	0.9406	5,079	15,573
12/31/2028	41.80	1.00	3.83	5,400	0.9205	4,971	20,544
12/31/2029	42.80	1.00	4.83	5,400	0.9008	4,864	25,408
12/31/2030	43.80	1.00	5.83	5,400	0.8815	4,760	30,168
12/31/2031	44.80	1.00	6.83	5,400	0.8626	4,658	34,826
12/31/2032	45.80	1.00	7.83	5,400	0.8442	4,558	39,385
12/31/2033	46.80	1.00	8.83	5,400	0.8261	4,461	43,846
12/31/2034	47.80	1.00	9.83	5,400	0.8084	4,365	48,211
12/31/2035	48.80	1.00	10.83	5,400	0.7911	4,272	52,483
12/31/2036	49.80	1.00	11.83	5,400	0.7742	4,180	56,663
12/31/2037	50.80	1.00	12.83	5,400	0.7576	4,091	60,754
12/31/2038	51.80	1.00	13.83	5,400	0.7414	4,003	64,758
12/31/2039	52.80	1.00	14.83	5,400	0.7255	3,918	68,676
12/31/2040	53.80	1.00	15.83	5,400	0.7100	3,834	72,509
12/31/2041	54.80	1.00	16.83	5,400	0.6948	3,752	76,261
12/31/2042	55.80	1.00	17.83	5,400	0.6799	3,672	79,933
12/31/2043	56.80	1.00	18.83	5,400	0.6654	3,593	83,526
12/31/2044	57.80	1.00	19.83	5,400	0.6511	3,516	87,042
12/31/2045	58.80	1.00	20.83	5,400	0.6372	3,441	90,483
12/31/2046	59.80	1.00	21.83	5,400	0.6235	3,367	93,850
12/31/2047	60.80	1.00	22.83	5,400	0.6102	3,295	97,145
12/31/2048	61.80	1.00	23.83	5,400	0.5971	3,225	100,369
12/31/2049	62.80	1.00	24.83	5,400	0.5844	3,156	103,525
12/31/2050	63.80	1.00	25.83	5,400	0.5718	3,088	106,613
12/31/2051	64.80	1.00	26.83	5,400	0.5596	3,022	109,635
12/31/2052	65.80	1.00	27.83	5,400	0.5476	2,957	112,592
12/31/2053	66.80	1.00	28.83	5,400	0.5359	2,894	115,486
12/31/2054	67.80	1.00	29.83	5,400	0.5244	2,832	118,318
12/31/2055	68.80	1.00	30.83	5,400	0.5132	2,771	121,089
12/31/2056	69.80	1.00	31.83	5,400	0.5022	2,712	123,801
12/31/2057	70.80	1.00	32.83	5,400	0.4915	2,654	126,455
12/31/2058	71.80	1.00	33.83	5,400	0.4810	2,597	129,052
12/31/2059	72.80	1.00	34.83	5,400	0.4707	2,542	131,594
12/31/2060	73.80	1.00	35.83	5,400	0.4606	2,487	134,081
12/31/2061	74.80	1.00	36.83	5,400	0.4507	2,434	136,515
12/31/2062	75.80	1.00	37.83	5,400	0.4411	2,382	138,896
12/31/2063	76.80	1.00	38.83	5,400	0.4316	2,331	141,227
12/31/2064	77.80	1.00	39.83	5,400	0.4224	2,281	143,508
12/31/2065	78.80	1.00	40.83	5,400	0.4134	2,232	145,740
12/31/2066	79.80	1.00	41.83	5,400	0.4045	2,184	147,925
12/31/2067	80.80	1.00	42.83	5,400	0.3959	2,138	150,062
3/16/2068	81.00	0.20	43.03	1,080	0.3941	426	150,488
Total		<u>43.03</u>		<u>\$ 233,280</u>		<u>\$ 150,488</u>	

Schedule 12

Charity A. Rowsey, CPA, MAFF, CVA

- Owner Rowsey Financial Forensics LLC, started February 1, 2024
- KCoe Isom, LLP d/b/a Pinion (principal) (January 2023-February 2024)
- Prior affiliation (shareholder) with Anderson ZurMuehlen (1999-2022)

Education

- Master of Science in Professional Accounting, Montana State University, graduated Summa Cum Laude – 1997
- Bachelor of Science Business, Accounting emphasis, Montana State University, graduated Summa Cum Laude – 1996
- Master Analyst in Financial Forensics – 2008
- Certified Valuation Analyst – 2009
- Continuing education courses through Montana Society of Certified Public Accountants (MSCPA), American Institute of Certified Public Accountants (AICPA), Washington Society of Certified Public Accountants (WSCP), National Association of Certified Valuators and Analysts (NACVA) and Anderson ZurMuehlen sponsored courses.

Experience

- Litigation and business consulting experience includes performance of, and assistance with, accounting and fraud investigations, business and financial analysis, stock valuations, and market and industry research. Computation of economic damages, including lost profits and earnings.
- Public accounting experience includes audits, compilations, reviews, analysis of internal controls, and preparation of tax returns.
- Prepared, reviewed, and analyzed financial statements and filings with the Securities and Exchange Commission, prepared forecasts and projections and evaluated management/business practices.
- Client groups served include retail and trade establishments, manufacturing companies, healthcare, and nonprofit organizations.

Awards, Activities, and Affiliations

- Member, AICPA
- Member, MSCPA
- Member, NACVA
- Member, National Association of Forensic Economics
- Member, Montana Business Assistance Connection, Loan Review Committee
- Published in Montana Lawyer, September 2003, *"Employment Fraud, How and Why is it Happening in Montana?"*

PHONE: 406.422.0171

E-MAIL: charity@rowseyff.com

Services to the Legal Profession

- Extensive litigation consulting experience assisting attorneys on both liability and damage issues.
- Assisted attorneys representing both plaintiffs and defendants with a similar degree of frequency.
- Development of innovative and reasonable solutions to complex business and damage problems.
- Examples of the types of services rendered in resolving issues of liability include:
 - Use of sophisticated computer spreadsheets and databases.
 - Interpretation of financial statements, tax returns, workpapers, Internet research, correspondence files and other source documents in fraud, contract disputes, and other business problem situations.
 - Evaluation of business practices.
- As a consultant, provided assistance with large complex litigation assignments for attorneys; organizing and databasing document files; analyzing and cross-referencing information from various sources and tracking inconsistencies; developing trial exhibits to illustrate business transactions and relationships in a simplified manner; and preparing and assisting with damage claims for settlement negotiations.
- Examples of services in situations needing preparation, assistance with, or evaluation of damage claims include:
 - Business Interruptions
 - Contractual Disputes/Terminations
 - Embezzlement/Fraud
 - Wrongful Death
 - Wrongful Termination
 - Malpractice (medical, legal and accounting)
 - Marital Dissolution
 - Personal Injury
 - Insurance Claim Disputes

Trial Testimony

CASE	YEAR	JUDGE	COUNSEL
Murphy Homes, Inc. v. Marilyn Muller & Patrick Aberle	2004	Judge Tucker	Palmer Hoovestall
Glover v. Skinner	2005	Judge Honzel	Norm Grosfield
Christy Fleming v. MacKenzie River Pizza Company	2005	Judge Salvagni	Norm Grosfield
Kuhr, et al v. City of Billings	2005	Judge Baugh	Rick Larson
Guardianship of M. Johnson	2006	Judge Tucker	Kevin Vainio
Pettinato v. Stephens & The Toggery, Inc.	2007	Judge Curtis	Brand Boyar
Linnda Dumont v. Pablo Water and Sewer District	2008	Hearing Officer Gregory L. Hanchett	Cindy Walker
Kristofer Williams v. Steck's Incorporated	2008	Judge Young	C. Edward Webster II
Messick & Bowman, et al v. Patrol Helicopters, Inc.	2008	Judge Ostby	Brooke Murphy
Hogan v. Hogan	2009	Judge Newman	Kathleen McBride
Stayner v. Peccia	2010	Judge Seeley	Mark Yeshe
Rooney v. City of Cut Bank	2011	Judge Anderson	Lin Deola
Michelle Keeley v. State of Montana, Department of Justice & Choteau County	2011	Judge McCarter	John Doubek
Swehla v. State of Montana	2012	Judge McCarter	Lin Deola
Devlin v. Devlin	2012	Judge Tucker	Abby Rinenbark
Patricia Thomas v. Jack Long	2012	Judge Sherlock	John Doubek
Ronda Taurman Kenser v. Premium Nail Concepts, Inc., et al.	2013	Judge Pinski	Jory Ruggiero, Esq.
Travis Gary v. Gus Varnavas, M.D.	2014	Judge Newman	John Dubek
Tim Meikle v. Jim Olsen and Human Interactive Products Incorporated	2014	Judge Kirscher	Brian Miller
Barton v. Barton	2014	Judge Allison	Kay Lynn Lee
Elizabeth Pritchard-Sleath v. Richard Oppen, Kathleen Zeeck, Larry LeRoux, & the Montana Department of Health & Human Resources	2014	Judge Christensen	Frederick Sherwood
Michael Schnittgen v. BNSF Railway Co.	2014	Judge Pinski	Anthony Nicastro
Ken & Cindy Farago v. Dessye-Clark, PhD/ARPN, et al.	2014	Judge Larson	Stephanie Kucera & Craig Daue
Holly Labair & Robert Labair, et al. v. Steve Carey, Esq., et al.	2015	Judge Larson	Tina Morin
Michael Finley v. BNSF Railway Company	2015	Judge Neill	Ben Snipes
Doug Elvbakken v. Protechnics, HRB	2015	Hearing Officer	Terry Spear
Robert Alwood v. Ecolab, Inc.	2016	Judge Watters	William Mattix
Brandy Overcash, individually and on behalf of the next of kin of Darrell Overcash, deceased v. Jones Contractors, Inc.	2016	Magistrate Charles S. Miller, Jr.	Kent Reiersen
Matter of Tina L. Morin	2020	Commission on Practice of the Supreme Court of State of Montana	Pamela Bucy
Matthew Winkler v. City of Billings	2020	Judge Davies	Veronica Procter
Apex Abrasives, Inc. v. WGI Heavy Minerals, Inc. and WGI Heavy Minerals, LLC	2020	Judge Molloy	Marshal Mickelson
Gregory Dahl v. Mark Runkle, et al.	2021	Arbitrator Axelberg	Matthew Baldassin, Lin Deola, & KD Feedback
Forrest and Jill Kreiman v. C & CB LLC	2021	Judge Bidegaray	Lisa Six
Kristina Landon v. James G. Clough, DPM	2022	Judge Kutzman	Keith Marr & Greg Pinski
William Marsh v. State of Montana, Department of Corrections	2022	Judge Menahan	Tara Harris
Kyle Harris v. Oasis Petroleum, Inc., et al.	2022	Judge Rustad	Shea Thomas
Kristine Groshelle v. Rodney "Shane" Groshelle	2022	Judge Allison	Kai Groenke
Mike Winsor vs. State of Montana, et al.	2023	Judge Riegers	Phil Hohenlohe
Bradley Traeholt and Abbry Traeholt vs. Menard, Inc.	2023	Judge Rustad	Aaron Nicholson
Jerry Theis v. Aflac, Inc.	2023	Arbitrators Silak, Trieweiler, & Tucker	William D'Alton
Joel Thompson vs. State of Montana, Department of Justice	2023	Judge McMahon	Tara Harris

Sherri Frost v. Kevin Frost, et al.	2024	Judge Marks	Nicole Siefert
Kleinhans Farm Estates, LLC, et al.			
v. Seth Wheeler, et al.	2024	Judge Allison	Marcel Quinn, Esq.
Jade Landers vs. Custer County Sheriff's Office	2024	Hearing Officer Jeffrey Doud	William D'Alton
Pharm406 v. Mason Bowman	2024	Arbitrator Fagg	David Lee

Deposition Testimony

CASE	YEAR	COUNSEL
Debbie Dahl v. West Mont	2004	Mike Meloy
Big Sky Paramedics, LLC v. Great Falls Emergency Services, Inc. et al	2004	Tim Fox & Will Gilbert
Dan Glover v. Andy & Carol Skinner	2004	Norm Grosfield
Kuhr, et al v. City of Billings	2005	Rick Larson
Hobson v. Community Medical Center	2007	Lawrence Daly
Young v. USA	2007	Andrew Biviano, AUSA
Kristofer Williams v. Steck's Incorporated	2008	C. Edward Webster II
Thomas Messick, Individually, and as Personal Representative of the Estate of Theresa J. Messick and Craig A. Bowman as Personal Representative of the Estate of Joan R.		
Bowman v. Patrol Helicopters, Inc.	2008	Brooke Murphy
Orion Buford v. Patricia Monaco	2008	Martin Studer
Hogan v. Hogan	2009	Kathleen McBride
Genie Land Company, et al v. Great Northern Properties, LP, et al	2010	J. Breting Engel
Thornton v. Gribben	2010	Rick Orizotti
Stayner v. Peccia	2010	Mark Yeshe
Arseneau v. Allstate	2010	Tracey Morin
Jim Rickman v. Lee Enterprises, Inc., d/b/a The Independent Record	2012	Cherche Prezeau
Scott & Jane Hineman v. Erickson's Pools & Spas, Inc., et al.	2012	Mark Kovacich
Kenser v. Premium Nail Concepts, Inc., et al.	2012	Domenic Cossi, Esq.
Tim Meikle v. Jim Olsen & Human Interactive Products Incorporated	2013	Brian Miller
Dan Morgan v. Father Carl Bonk	2013	John Fitzpatrick
Jennifer Sorensen v. Boyd Andrew Community Services, d/b/a Elkhorn Treatment Center	2014	Stephanie Kucera
Marvin Monroe and Debra Monroe v. First Community Bank, et al.	2014	Thomas Budewitz
Ken & Cindy Farago v. Dessye-Clark, PhD/APRN and Sound View Imaging	2014	Stephanie Kucera
Scott Chamberlain v. Sidney Health Center and Sidney Health Center Clinic	2014	John Fitzpatrick
Tammie Kelley & Jason Kelley v. Jeanne Sticht, M.D.	2014	Randy Dix
Koni Dole v. Billings Clinic	2014	Fritz Pierce & Dave Whisenand
Shelby Cleveland v. Janice Ward	2015	Brian Miller
Bruce Bruckner v. Rich Hofer & East Malta Hutterian Brethren aka East Malta Hutterite Colony	2015	Brooke Murphy
Robert Lee, John Hagman, & Matthew Flesch v. Ruck E. Traxier, et. al.	2015	Luke Casey
Timothy Hysell and Marsha Hysell v. The Lincoln Electric Company, et al	2015	Ben Snipes
Gary L. Frisch v. Tamim J. Khaliqi, M. D.	2015	Jim Hunt
Wendell Plentyhawk v. Mansoor Sheikh, M. D., et al.	2016	Brian Taylor and Steve Hamilton
Laurie Townsend and the Estate of Thomas Townsend v. Montana Cardiology, PC	2016	John Russell
Randy Zeman v. BNSF Railway Co.	2016	David Slovak
James Watson v. The City of Sidney	2016	Paul Odegaard
Laurence L. Steiger v. David E. Pheanis II and Springfield Cartage, LLC	2016	Adam Warren
Jacob Harris v. American Sheet Metal and Roofing Service, Inc.	2018	Jim Hunt
Deborah Gustafson v. Jeffrey D. Georgia, M. D., et al.	2018	Keith Marr
Randy Zito, et al. v. Progressive Insurance Company, et al.	2019	Nicholas Pagnotta

Robert Cazier v. Monsanto Company and Rocky Mountain Supply, Inc.	2019	Justin Stalpes
Jasmine Garcia, et al. v Aveda Transportation and Energy Services, et al.	2019	Kent Reiersen
Chad Chandler v. Whiting Oil and Gas Corporation and Pioneer Drilling Services	2020	Mark Kovacich and Jacy Suenram
Jeffrey L. Evans v. St. Vincent Healthcare, and Kristian French, MD.	2020	Elizabeth Hausbeck
Jennifer Barton v. Arrow Striping & Manufacturing, et al.	2021	Ryan Gustafson and Patrick Sullivan
Northern Rockies Neuro-Spine, P.C., et al. v. ONI Realty Investors, LLC, et al.	2022	Gerry Fagan
Joel Thompson v. State of Montana	2022	Tara Harris
David S. Zrowka vs. BNSF Railway Company	2022	Keith Marr
Josh Dwyer v. David Crossley, P.A.	2023	Brian Miller
Kleinhans Farm Estates, LLC vs. Seth Wheeler and Lindsey Wheeler	2024	Thomas Hollo
Patrick Lafata v. Walmart, Inc.	2024	Marcel Quinn
		Amanda Hunter

Business/Stock Appraisals

COMPANY NAME

Bison Engineering, Inc.
D.L. Evans Bankcorp
Forsyth Bancshares, Inc.
Helena Physician Group, LLC
Bear Creek Country Kitchens
Scheels All Sports, Inc.
Kane Funeral Home, LLC
Yellowstone Angler, Inc.
Le Sorelle, LLC
Augustine Properties, LLC

LOCATION

Helena, Montana
Burley, Idaho
Forsyth, Montana
Helena, Montana
Heber City, Utah
Fargo, North Dakota
Sheridan, Wyoming
Livingston, Montana
Helena, Montana
Helena, Montana